IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:

Bankruptcy No. 16-70824 JAD JESSICA MARIE SHAFFER

Debtor

WELLS FARGO BANK, N.A. Chapter 13

Movant

Doc. No. 49

VS.

JESSICA MARIE SHAFFER

Respondent

Related to Claim No. 1

and

RONDA J. WINNECOUR,

STANDING CHAPTER 13 TRUSTEE

Additional Respondent

DECLARATION REGARDING MONTHLY PAYMENT CHANGE

AND NOW, comes the Debtor, Jessica Marie Shaffer, by and through her attorney, Jeffrey W. Ross, Esq. and Harold Shepley & Associates, LLC, and respectfully files the within Declaration Regarding Monthly Payment Change and, in support, represents as follows:

- 1. The Debtor is Jessica Marie Shaffer presently residing at 307 Maxwell Street, Gallitzin, PA 16641.
- 2. Counsel for the Debtors is Jeffrey W. Ross, Esq. of Harold Shepley & Associates, LLC.
- 3. The mortgage company for the Debtor's residence is Wells Fargo Bank, N.A.
- 4. The new post-petition monthly payment payable to Wells Fargo Bank, N.A. beginning 1 June 2020 is \$1.05 less than current payment encompassing interest, principal and escrow being made by the Chapter 13 Trustee..
- 5. Debtor's counsel has reviewed the existing plan, recomputed the plan payment and finds that the existing payment continues to be sufficient to fund the plan.

6. Debtor's counsel requests that the current payment to Wells Fargo Bank, N.A of \$387.05 remain as currently scheduled to take into account potential changes in escrow fees and upward adjustments of Debtor's interest rate in the future.

Date: 21 April 2020

/s/ Jeffrey W. Ross
Jeffrey W. Ross, Esq.
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